

4. Due to the Thanksgiving Holiday, Plaintiffs sought consent from Defendants to file a Reply to Defendants' Response to Plaintiffs' Motion for Leave to File First Amended Complaint on December 14, 2015.

5. However, in an email to Plaintiffs' counsel on November 17, 2015, Defendants' counsel consented to a time extension of twenty two (22) days, which is December 4, 2015. Defense counsel asked Plaintiffs' counsel if there were any other reasons why additional time beyond the 4th should be granted.

6. On December 19, Plaintiffs' counsel emailed Defense counsel and again asked for consent to a time extension to December 14, 2015, due to the holidays as well as Plaintiffs' counsel's travel out of state on December 3-6 for legal training.

7. Plaintiff's counsel will be traveling during the Thanksgiving Holiday to visit family. Counsel will also be traveling out of state on December 3-6 for the purpose of receiving additional legal training necessary to improving his legal practice. Both activities will on their own strain Plaintiffs' counsel's ability to service his legal practice, in addition to being able to respond in the present matter before the Court.

8. As a result, Plaintiffs' counsel has a need for an extension of time to file Plaintiffs' Reply to Defendants' Response (Doc. 57), beyond December 4th.

9. Therefore, Plaintiffs request through and including December 14, 2015 to file Plaintiffs' Reply to Doc. 57.

10. Granting this Motion will not prejudice Defendants, nor will it unduly delay or hinder these proceedings.

11. This Motion is made in the interest of justice, in that the Court would be best served by thorough and thoughtful briefing of the issues raised in Defendants' Response.

12. A proposed Order is attached hereto.

WHEREFORE, Plaintiffs respectfully move the Court to approve the above-proposed briefing schedule.

Respectfully submitted,

THE BURNS LAW FIRM, LLC

/s/ John C. Burns
John C. Burns #66462MO
1717 Park Avenue
St. Louis, MO 63104
Phone: (314) 339-8388
Fax: (314) 932-2171
john@burns-law-firm.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served, via the Court's electronic notification system, on November 19, 2015, upon all parties of record.

/s/ John C. Burns

